



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352
JUN 29 2001

0055200

01-WMD-155

Mr. Harold Heacock
TRIDEC
901 N. Colorado Street
Kennewick, Washington 99336

Dear Mr. Heacock:

RESPONSES TO COMMENTS PROVIDED FOR THE ENVIRONMENTAL ASSESSMENT
(EA) FOR K BASINS SLUDGE STORAGE AT 221-T BUILDING, HANFORD SITE,
RICHLAND (DOE/EA-1369)

The U.S. Department of Energy, Richland Operations Office (RL), has reviewed the comments you provided via e-mail on Tuesday, April 17, 2001, on the EA for K Basins Sludge Storage at 221-T Building, Hanford Site, Richland (DOE/EA-1369). Enclosed are RL responses to your comments.

Please direct any questions about these responses to Todd Shrader, Waste Management Division, on (509) 376-2725. Questions regarding the National Environmental Policy Act process may be directed to me on (509) 376-6667.

Sincerely,

Paul F. X. Dunigan, Jr.
for Paul F. X. Dunigan, Jr.
NEPA Compliance Officer

WMD:TAS

Enclosure

cc w/encl:
Administrative Record

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JUL 16 2001
EDMC

Enclosure

The following is a list of questions and responses submitted by Harold Heacock.

1. **"The draft EA adequately addresses the issues related to the storage of the K Basins sludge prior to disposal and does not identify any adverse environmental impacts from the proposed action. However, the documentation does not identify any time limit for the storage of the wet sludge prior to disposal and does not evaluate the potential impacts of the processing which will be required for extended storage of the sludge. Additionally, the draft EA does not identify any required processing of the sludge prior to disposal or the method, location, timing, and environmental impacts of ultimate disposal of the sludge. Due to failure of the EA to address these issues, we must consider the Draft EA as currently written to be unacceptable in that all potential impacts of the proposed sludge disposal have not been considered."**

Treatment or processing of the sludge is considered outside the scope of this Environmental Assessment. The scope of the Environmental Assessment is to analyze the storage of the sludge at T Plant. The containers are designed for a 30-year life and the facility will be maintained during this time to safely store the sludge. Further, as the sludge is a Remote Handled Transuranic Waste (RH-TRU), it is designated for disposal at the Waste Isolation Pilot Plant (WIPP). However, WIPP has not yet finalized the acceptance criteria for RH-TRU. Thus, it is not possible to discuss specific processing/treatment options for the sludge in this EA. When the treatment and processing requirements for RH-TRU are known, they will be analyzed in future NEPA reviews as appropriate.

2. **"The draft EA does make reference to the inclusion of a future Hanford Solid Waste Environmental Impact Statement (HSW-EIS); however, no commitment is made as to the scope or timing for the completion of the additional EIS. In view of the extensive delays, which have occurred to date in the preparation of the HSW-EIS and concerns regarding the adequacy of the assessment of these issues, we believe that these issues must be addressed prior to the completion of the subject EA. It should be possible to complete these additional assessments without any delay to the K Basin Spent Fuel Program."**

The storage of the K Basins sludge at T Plant does not depend on or prejudice the HSW-EIS. This Environmental Assessment is an allowed Interim Action to the HSW-EIS per 10 CFR 1021.211. Based on the analysis presented in this Environmental Assessment, the U.S Department of Energy will determine if a Finding of No Significant Impact is appropriate for the sludge storage mission at T Plant.